

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

WILLIAM C. BOND,

*

Plaintiff *Pro Se*

v.

*

Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., et al.

*

Defendants

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* * * * *

**MOTION FOR PERMANENT INJUNCTION AND RESTRAINING ORDER AND
REQUEST FOR HEARING**

1. Plaintiff incorporates his Motion and Memorandum in Support of Motion for Fed. R. Civ. P. 60 (b) Relief from Judgment or Order.

2. Plaintiff incorporates his Renewed Motion to Recuse and Motion for Case to be Specially Assigned to a Visiting Judge or that the Court Grant a Change of Venue.

2. Just ten days after oral argument in the underlying case before Judge Garbis on November 30, 2001, Defendant Dudley F.B. Hodgson had an extensive conversation with reporter Manuel Roig-Franzia of the *Washington Post*. (Exhibit #1)

3. On December 10, 2001, on the very day the Custody Case Trial began, the *Washington*

Post published a Page One (1) feature story about Plaintiff and his Manuscripts. (See Exhibit #3)

4. Plaintiff's prior counsel filed a Motion to Alter or Amend Judgment on November 26, 2001.

(Exhibit # 2.) Plaintiff's prior counsel filed Plaintiff's Reply Memorandum in Support of Plaintiff's Amended Motion to Alter or Amend Judgment on December 17, 2001, stating that sections of the Manuscript used in the *Post* story could not be attributed to any Court filings counsel could locate. (Exhibit #3)

5. Plaintiff alleges and avers that Defendants purposely used Court filings littered with Plaintiff's unpublished works for no other reason, as argued in the underlying case and these Motions, than to give the media "Fair Use" of Plaintiff's unpublished Manuscripts; and to pollute the jury pool, influence judges, and for other reasons stated in detail in Plaintiff's Memorandum in Support of Motion for Fed. R. Civ. P. 60 (b) Relief from Judgment or Order.

6. Because of Plaintiff's present allegations against Defendants, the filing of a new Action, and Defendants' past misuse as well as the above information, Plaintiff asks this Court to enter a Permanent Injunction and Restraining Order under Fed. Civ. Rule 65 and Order that all Copies of Plaintiff's Manuscripts and other writings in possession of the Defendants, their lawyers, or any other person who was supplied copies of said Manuscripts in any litigation resulting from the Copyright Case, Custody Case, or Criminal Case, including, but not limited to *Bond v.*

Messerman et al., *Bond v. Blum Sr. et al.*, and *Bond v. Pessin et al.*, be Ordered to return all Copies of said Manuscripts to the Court and to account, under oath, for all disseminations.

7. Plaintiff requests a Hearing on this matter.

WHEREFORE, for the aforementioned reasons, Plaintiff asks this Court to Grant to hold a Hearing on this Motion, to Grant his Injunction and Restraining Order, to Order the return of all his Manuscripts at issue in the Copyright Case to the Court, and for the Court to either Order their return to Plaintiff or their destruction and to have each party who came into contact with the Manuscripts account under oath, at a the Hearing, for any dissemination or knowledge of such dissemination



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2007, copies of Plaintiff's Motion for Permanent Injunction and Restraining Order and Request for Hearing were mailed FedEx, postage prepaid, to William F. Ryan, Jr., Esquire, Amy E. Askew, Esquire, Whiteford, Taylor & Preston, LLP, Suite 1400, 7 St. Paul Street, Baltimore, Maryland 21202-1626, attorneys for McDaniel, Bennett & Griffin; Gerard P. Martin, Esquire, Thy C. Pham, Esquire, Rosenberg, Martin, Funk & Greenberg LLP, 25 South Charles Street, Suite 2115, Baltimore, Maryland 21201-3322, attorneys for Defendants, Dudley F. B. Hodgson, Kenneth Blum, Sr. and Kenneth Blum, Jr.; Andrew Radding, Esquire, Michael R. Severino, Esquire, Adelberg, Rudow, Dorf & Hendler, LLC, 600 Mercantile Bank & Trust Building, 2 Hopkins Plaza, Baltimore, Maryland 21201-2927, attorneys for Defendant, Adelberg, Rudow, Dorf & Hendler, LLC; and Kathryn Miller Goldman, Esquire, Jiranek, Goldman & Minton, LLC, Suite 401, 19 E. Fayette Street, Baltimore, Maryland 21202-3316, attorneys for William Slavin.



WILLIAM C. BOND